



P.O. Box 625, Rt. 331S, Millsboro, DE 19966

October 12, 2011

Mr. Glenn Davis
Program Manager
Surface Water Discharges Section
DNREC
89 Kings Highway
Dover DE 19901

RE: Compliance Sampling & Inspection NPDES Permit No. DE-0000736 SWP/SPCC Training



Dear Mr. Davis

This letter serves as Pinnacle Foods Group LLC'S response to required corrective actions for the noted deficiencies during our CSI inspection.

Enclosed you will find copies of the SWP/SPCC training materials as well as employee and contractor sign in sheets. Contractors were trained as they signed in; the training will also be included in their yearly Contractor Qualification packet. The employee training will be done in the future by myself during our annual training and also included in new employee training.

The Storm Water Plan will be reviewed and updated. The review log will also be updated and forwarded to the DNREC-Surface Water Discharges Section within the specified time frame.

Should you have any questions please call me at 302-934-3833.

Sincerely,

Robert E. Lynch

Environmental/Wastewater Supervisor

### **Acknowledgement of Training**

All training whether mandated by a regulatory agency (i.e., OSHA, HACCP, USDA, FDA) or deemed necessary by Pinnacle Foods Group requires an attendees signature sheet to be provided to the H.R. Training Department. Your participation in this training event will not be considered completed until a fully documented attendance roster is turned in and filed on record.

Your signature is an acknowledgement that you understood and participated in the /ED following training.

TRAINING NAME: SWP/SPCC

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**SURFACE WATER** 

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TRAINING NAME: SWP/SPCC

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DATE OF TRAINING

LENGTH OF TRAINING (in minutes)

NAME OF PRESENTER

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Your signature is an acknowledgement that you understood and participated in the following training. TRAINING NAME DATE OF TRAINING LENGTH OF TRAINING (in minutes) Kupp + Randy Fidderman NAME OF PRESENTER **EMPLOYEE NAME** SIGNATURE Batson, Lionel Conner, Terry Downs, Beverly Fidderman, Randy Figgs, Mary Godwin, Bryan King, Sandra Kneipp, Kim Moore, Michael Mullen, Anthony Snead, James West, Donald Don west Wise, Terence JACKEH Jarrett, Lamar Seasonal Employees Adjocy, Daniel Barreau, Bernard LINWOOD W ROSS Seme, Rosemene Wilkerson, Robert

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in the following training.

TRAINING NAME	SWT – SPCC Training
DATE OF TRAINING	8/11/11, 8/12/11
LENGTH OF TRAINING (in min.)	15 min
NAME OF PRESENTER	A. Potter, D. Carter

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Potter, Art	
Puckett, Roger	
Seyfert, Kevin	
Tubbs, Ronnie	Romoffello
Wilkins, Keith	

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DATE OF TRAINING

LENGTH OF TRAINING (in minutes)

NAME OF PRESENTER

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EMPLOYEE NAME	SIGNATURE
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DATE OF TRAINING

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TRAINING NAME
DATE OF TRAINING

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NAME OF PRESENTER	RANDY FIDDERMAN	
EMPLOYEE NAME	SIGNATURE /	
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tonowing training.	
TRAINING NAME	Storm WATER TRAINING
DATE OF TRAINING	Storm WATER TRAINING October 11, 2011
LENGTH OF TRAINING (in minutes)	BANDY FIDDERMAN
NAME OF PRESENTER	BANDY FIDDERMAN
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EMPLOYEE NAME	SIGNATURE
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Greg Johnson	Stur Johnson
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Your signature is an acknowledgement that you understood and participated in the following training. STURM WHER TRAWING & TRAINING NAME BOB LYNCH DATE OF TRAINING 8/11/11 SPCC LENGTH OF TRAINING (in minutes) 30 MINS. NAME OF PRESENTER BOB LYNCH EMPLOYEE NAME **SIGNATURE** Alexander, Vontray Balas, John 10/6/2 Bove, Dan Carbaugh, Nate Carter, Dave Condon, Bill Dickerson, Cindy Dupont, Blondena 10/6/11 Fidderman, Randy Genna, Jennifer Jenkins, Bunky 10/6/11 Jones, Mary Kneipp, Kim Legros, Wilner Leslie, Herb Lynch, Bobby Marshall, Rene Mosley, Carol 10/6/11 Nguyen, Anthony Parkinson, Dennis Potter, Art Revel, Dave Sammons, Danna 10/6/11 Spence, Randy Towers, Lana

### Pinnacle Foods Group LLC Millsboro, De. Facility Contractor SWP/SPCC Training

RECEIVED

OCT 13 2011

SURFACE WATER

River. The State of Delaware has granted our plant a permit for releasing storm water runoff through these Our plant has eight storm drains that discharge rain water into Wharton's Branch, a tributary of the Indian various storm drains.

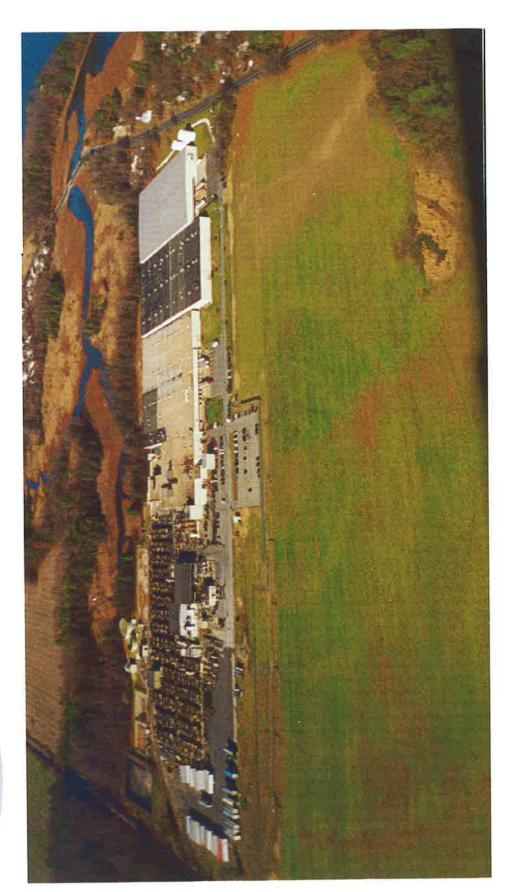
Our permit states that only rainwater may be released via these storm drains. Please make sure that all materials associated with your business do not enter a storm drain. In the event that you do have a spill notify the Environmental Dept. at 302-934-3833 or Bob Lynch directly via cell at 302-228-3015.

• In the event that they can not be reached notify any plant personnel.

# STORM WATER TRAINING

SPCC TRAINING

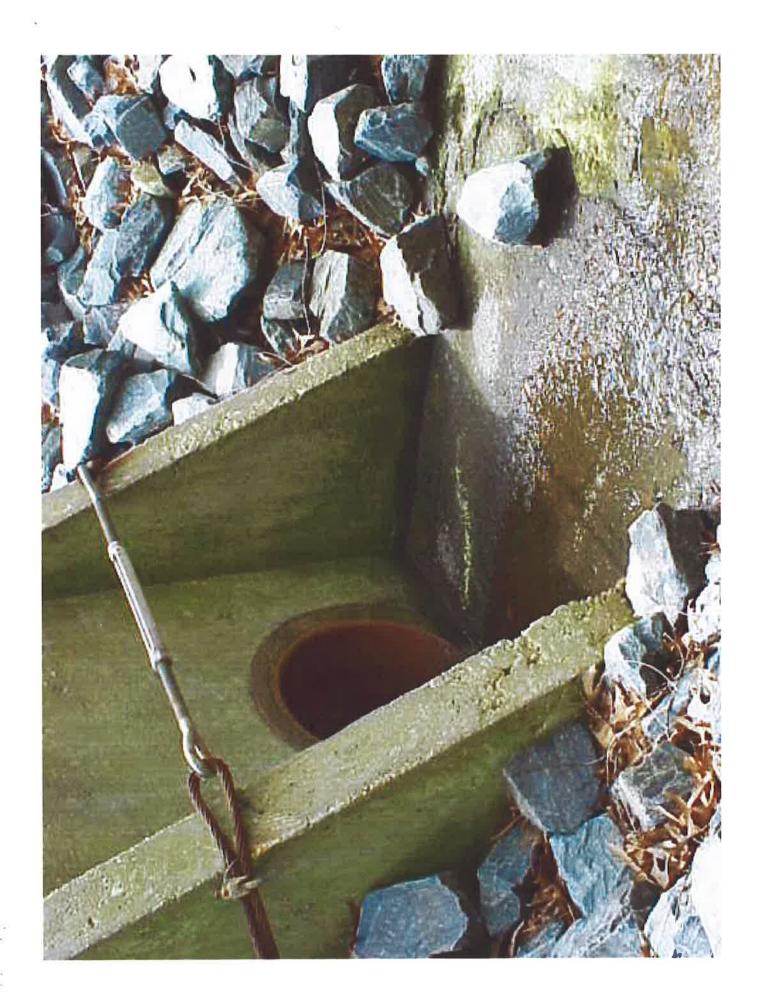




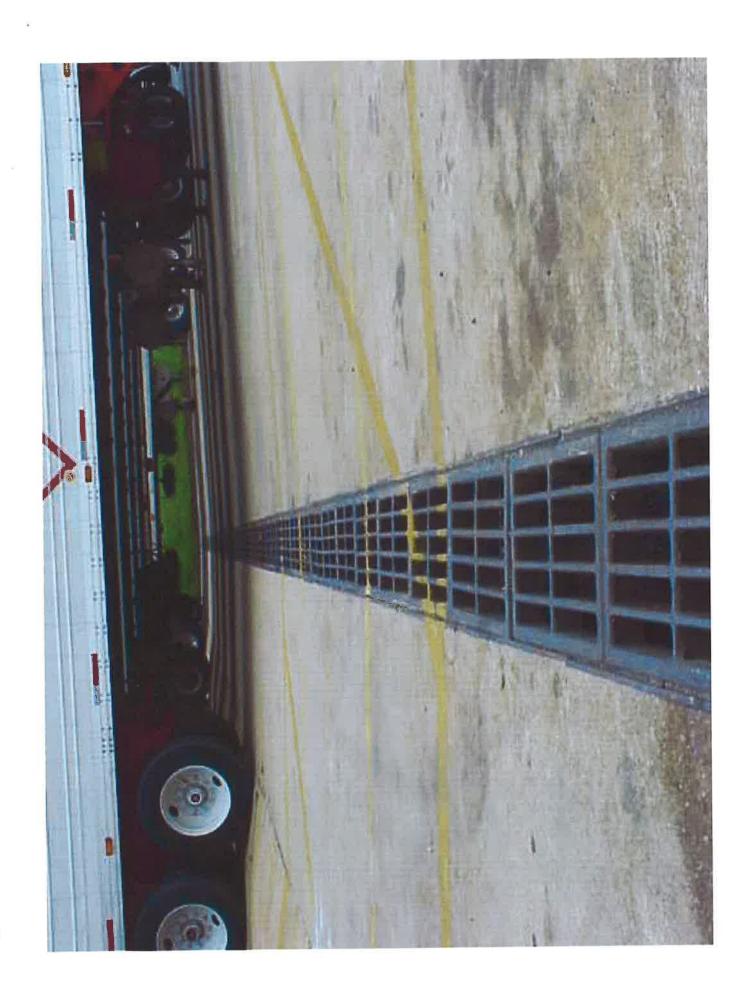
# STORM DRAINS

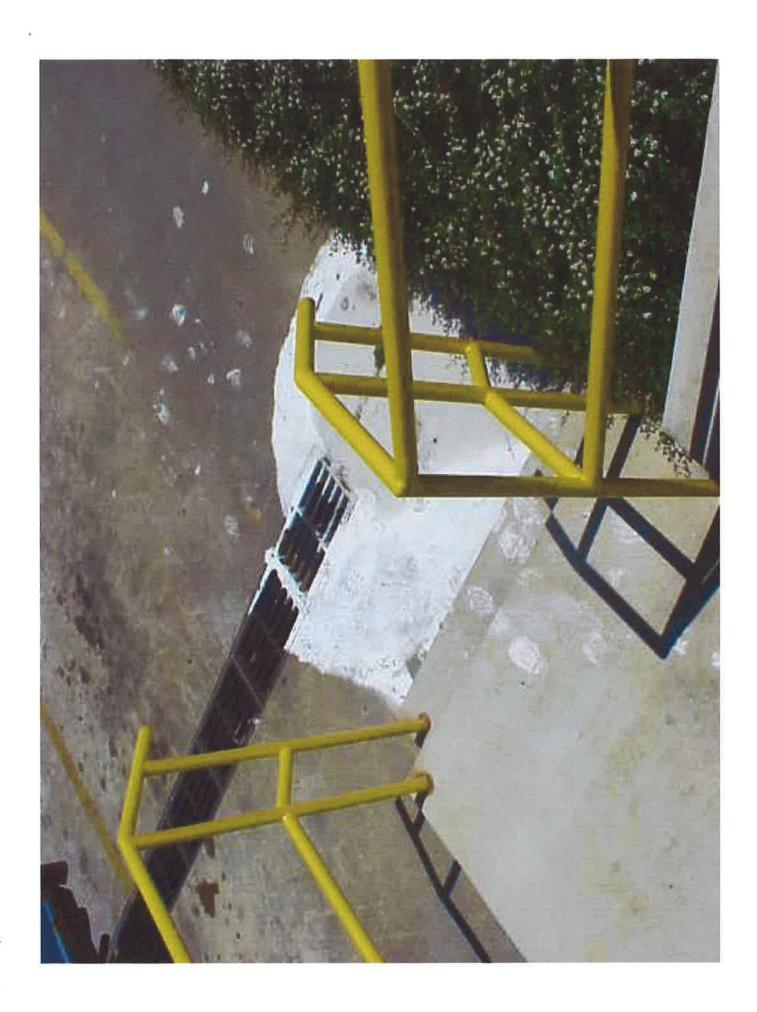
storm drains. All of the drains are outside and are labeled "STORM DRAIN -Branch, a tributary of the Indian River. The State of Delaware has granted Our plant has eight storm drains that discharge rain water into Wharton's our plant a permit for releasing storm water runoff through these various NO DUMPING, INDIAN RIVER DRAINAGE".

drains. Please make sure that all materials associated with our business do Our permit states that only rainwater may be released via these storm not enter a storm drain. This includes:











## SPCC

- WHEN TRANSFERRING BULK MATERIALS, THE TRUCK DRIVER AND A DESIGNATED VLASIC **EMPLOYEE MUST STAND BY**
- ENVIRONMENTAL DEPARTMENT HOLD THE KEYS. ALL BERM DRAINS ARE LOCKED IN THE CLOSED POSITION. MAINTENANCE STAFF AND THE
- DRAINING. RECORD THE DRAINING OF THE BERM ON THE SHEETS IN THE ENVIRONMENTAL OFFICE. A CAREFUL INSPECTION OF THE RAINWATER IN A CONTAINMENT BERM MUST BE MADE PRIOR TO
- ANY CONTAMINATED RAINWATER MUST BE PUMPED OUT AND HAULED BY A LICENSED HAULER.

# Pinnacle

### BOILER ROOM-IN FRONT OF CLEANING SYSTEM WAREHOUSE/LABELING- ACROSS FROM VINEGAR PLANT - SMALL DRUM SPILL KIT DRUM LOCATIONS TANKYARD - SALT SHED SANITATION CAGE

SPILL KIT CARRY BAG LOCATIONS PROCESS ROOM

# Control & Countermeasure Spill Prevention,

Prevention of leaks & spills from drums & tank trucks.

Secondary Containment!

Proper Containment and cleanup!

Visual observation and corrective action!

Use spill kits & notify your Supervisor of spills or leaks!

Spilled fluids must be prevented from going into the ground or down the drain!

